IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

Bank, National Association, Successor in interest to National City Bank, Successor in interest to MidAmerica Bank, FSB

Plaintiff,

v.

Luz R. Moreno; Fernando G. Moreno

Case No. 11 CV 05600

Assigned Judge: Castillo

Magistrate Judge: Valdez

Defendants.

MOTION FOR JUDGMENT OF FORECLOSURE AND SALE

NOW COMES the Plaintiff, PNC Bank, National Association, Successor in interest to National City Bank, Successor in interest to MidAmerica Bank, FSB, by its attorneys CROWLEY & LAMB, P.C., and moves the Court for the entry of a Judgment of Foreclosure and Sale in its favor and against the Defendant(s):

Luz R. Moreno

Fernando G. Moreno

And as grounds thereof state:

As appears from the Affidavit of Plaintiff attached as Exhibit A, and from the pleadings and admissions on file, there is no genuine issue as to any material fact, and the Plaintiff is entitled to a Judgment of Foreclosure and Sale in this case as a matter of law.

> PNC Bank, National Association, Successor in interest to National City Bank, Successor in interest to MidAmerica Bank, FSB

One of Its Attorneys

Patrick D. Lamb

Francis J. Pendergast, III

CROWLEY & LAMB, P.C.

221 N. LaSalle Street, Suite 1550

Chicago, Illinois 60601

(312) 670-6900